

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ANNA DEYOUNG, in her individual
capacity and as Executor under the Will of
Jeffrey Maddox.

Plaintiffs,

vs.

CHRISTOPHER JAMES CONNER,
CONNER AND ASSOCIATES, LLC d/b/a
FRANCHISE MARKETING SYSTEMS,
GREG RONDINELLI, JOHN F. COGGIN,
CPA PLLC, ANODYNE PAIN AND
WELLNESS, INC., WAYNE MACK,
RICHARD WALDO, GREGORY SIMONS,
JEFFREY STEVENSON, FRANDEVCO
LLC, BRANDON WILSON, FRANCHISE
CONSULTING CORPORATION, and
PATRICK ELSSNER

Defendants.

No. 4:24-cv-01580

[Hon. Keith P. Ellison]

AMENDED STIPULATION REGARDING RESPONSIVE PLEADING DATE
FOR DEFENDANT JOHN F. COGGIN, CPA PLLC

Plaintiff Anna DeYoung, in her individual capacity and as Executor under the Will of Jeffrey Maddox (“Plaintiff”), and Defendant John F. Coggin, CPA PLLC (“Coggin”) file this Amended Stipulation Regarding Responsive Pleading Date, as follows:

1. Plaintiff filed her Original Complaint against Coggin, among others, on April 26, 2024. [Dkt. 1]. Coggin was subsequently served with process on May 16, 2024. [Dkt. 6]. In their original Stipulation Regarding Responsive Pleading Date for Defendant John F. Coggin, CPA PLLC [Dkt. 11], Plaintiff and Coggin agreed and stipulated to an extension of Coggin’s responsive pleading deadline to July 3, 2024.

2. Plaintiff and Coggin now stipulate to a further extension of Coggin's responsive pleading deadline. To that end, Plaintiff and Coggin agree and stipulate that the deadline for Coggin to file a responsive pleading to Plaintiff's Original Complaint [Dkt. 1] is extended from July 3, 2024 to July 17, 2024.

3. Plaintiff and Coggin agree and stipulate that by entering into this agreement and stipulation regarding the extension of the responsive pleading deadline, Coggin is not waiving any challenges it may have to venue, to jurisdiction, or pursuant to Federal Rule of Civil Procedure 12.

Dated: July 3, 2024

Respectfully submitted,

By: /s/ Adam T. Hamilton (w/permission)

David G. Crooks, Esq.
Tex. Bar No. 24028168
Adam T. Hamilton, Esq.
Tex. Bar No. 24087655
FOX ROTHSCHILD LLP
Saint Ann Court
2501 North Harwood Street, Suite 1800
Dallas, TX 75201
Telephone: (214) 231-5796
Facsimile: (972) 404-0516
E-mail: dcrooks@foxrothschild.com
E-mail: ahamilton@foxrothschild.com

Counsel for Plaintiff

By: /s/ Lindsey K. Wyrick

Lindsey K. Wyrick
Texas Bar No. 24063957
R. Price Anderson
Texas Bar No. 24116029
COBB MARTINEZ WOODWARD PLLC
1700 Pacific Avenue, Suite 3100
Dallas, Texas 75201
(214) 220-5200 (Telephone)
(214) 220-5299 (Facsimile)
lwyrick@cobbmartinez.com
panderson@cobbmartinez.com

**Counsel for Defendant John F. Coggin, CPA
PLLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of July, 2024, a true and correct copy of the above and foregoing was caused to be served through this Court's CM/ECF noticing system to all parties registered to receive notices in this case.

/s/ Lindsey K. Wyrick

Lindsey K. Wyrick